

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

IN RE:

**AMIR'S ANTIQUES & DECORATIVE
RUGS, INC.**

Debtors-in-Possession

)
)
)
)
)
)
)

**Case No.: 10-12749-SSM
Chapter 11**

**RESPONSE TO TRUSTEE'S OBJECTION AND AMENDED
OBJECTION TO APPROVAL OF EMPLOYMENT OF
LESLIE D. SILVERMAN AS DEBTOR'S COUNSEL**

NOW COMES, Leslie D. Silverman, Esquire, and Leslie D. Silverman, P.C., and in response to the Trustee's Objection and Amended Objection to Approval of Employment of Leslie D. Silverman as Debtor's Counsel, states as follows:

1. That undersigned counsel filed an Application For Approval to be Employed as counsel for Amir's Antiques & Decorative Rugs, Inc., in the above-referenced bankruptcy proceeding.
2. That counsel has been a practicing attorney for seventeen (17) years.
3. That undersigned counsel has been specializing in bankruptcy for more than fifteen (15) years.
4. That prior to the filing of the instant Chapter 11 case, undersigned counsel had disclosed to Mehdi Navid, the principal of the above-referenced Chapter 11 debtor, and his son, Ahmad Navid, that representing them could present a conflict of interest in that both parties were judgment debtors in litigation pending in the U.S. District Court for the

District of Maryland. At the time undersigned counsel met the Navid's, they had been judgment debtors for close to one (1) year.

5. That Mehdi Navid and Ahmad Navid were instructed to consider obtaining independent counsel to represent either of the parties.
6. That undersigned counsel continuously raised the potential conflict of interest and has been told by both Mehdi Navid and Ahmad Navid that there is no conflict of interest and that any potential conflict of interest is hereby waived.
7. That undersigned counsel, in her Verified Statement in Connection with Employment of Counsel, disclosed the involvement of Silverman & Silverman, LLC's representation of Mehdi Navid, personally, in a Chapter 11 proceeding, which is attached hereto as Exhibit A.
8. That undersigned counsel, in her Verified Statement in Connection with Employment of Counsel, also disclosed the involvement of King & Silverman, LLC's representation of Ahmad Navid in a Chapter 11 proceeding in the U.S. Bankruptcy Court for the District of Maryland.
9. That, in addition, Mehdi Navid and Ahmad Navid have executed a written waiver of potential conflict of interest, which is attached hereto as Exhibit B.
10. That undersigned counsel has disclosed the potential conflict of interest and has been in good faith representing the debtor since the filing date of April 8, 2010. Given the seizure of the debtor's inventory of 304 area rugs prior to the filing, significant time and effort has been expended by counsel, with two (2) law firms hired consecutively by the judgment creditor, Prestige Capital Corporation.

WHEREFORE, undersigned counsel respectfully requests that the Application to Employ is granted, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Leslie D. Silverman, Esquire, #41107
Leslie D. Silverman, Esq.
Leslie D. Silverman, P.C.
3470 Olney Laytonsville Road
Suite 333
Olney, MD 20832
(301) 774-5999
Attorney for Amir's Antiques & Decorative Rugs, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY this 12th day of August, 2010, that a copy of the foregoing Response to Trustee's Objection and Amended Objection to Application to Approval of Employment of Leslie D. Silverman, was served electronically via the CM/ECF system or was mailed a copy via first-class mail, postage prepaid, to the debtor, all creditors listed on their matrix, all parties requesting service, and the following:

Jack Frankel, Esq.
Office of the U.S. Trustee
115 S. Union Street, Suite 210
Alexandria, VA 22314

Office of the U.S. Trustee
115 S. Union Street, Suite 210
Alexandria, VA 22314

Joshua Taylor, Esq.
Michael Baratz, Esq.
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

Jeremy S. Friedberg, Esq.
Leitess Leitess Friedberg & Fedder PC
One Corporate Center
10451 Mill Run Circle, Suite 1000
Baltimore, MD 21117

/s/ Leslie D. Silverman, Esq.
Leslie D. Silverman, Esq., #41107

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

| | | |
|--|---|-------------------------------|
| IN RE: |) | |
| |) | |
| AMIR'S ANTIQUES & DECORATIVE RUGS, INC. |) | Case No.: 10-12749-SSM |
| |) | Chapter 11 |
| |) | |
| Debtors-in-Possession |) | |
| |) | |

**VERIFIED STATEMENT IN CONNECTION WITH
EMPLOYMENT OF COUNSEL**

Leslie D. Silverman, Esquire, on behalf of Leslie D. Silverman, P.C., hereby makes the following verified statements in support of her employment in this case:

1. I am a practicing member of the Federal Bar and also a member of the Maryland Bar Association, District of Columbia Bar Association and Virginia Bar Association.
2. I have been a practicing attorney for approximately seventeen (17) years.
3. I am a member of the law firm Leslie D. Silverman, P.C., with principal offices located at 3470 Olney Laytonsville Road, Suite 333, Olney, Maryland 20832.
4. The fee for services rendered shall be \$250.00 per hour, which is consistent with the rate charged in this industry.
5. That the law firm of Silverman & Silverman, LLC, of which Leslie D. Silverman, Esquire is a member, has been retained by Mehdi Navid to represent him in a Chapter 11 proceeding, docketed as case number 09-

31944-WIL, in the United States Bankruptcy Court for the District of Maryland, Greenbelt Division.

6. That the law firm of King & Silverman, LLC, of which Leslie D. Silverman, Esquire is a member, has been retained to represent a co-debtor of the debtor-in-possession.
7. Neither Leslie D. Silverman, P.C., nor I represent any interests adverse to the Debtor-in-Possession or the estate in the matter upon which we are to be engaged.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Respectfully submitted,

/s/ Leslie D. Silverman, Esquire, #41107
Leslie D. Silverman, Esq.
Leslie D. Silverman, P.C.
3470 Olney Laytonsville Road
Suite 333
Olney, MD 20832
(301) 441-9000

Dated: April 27, 2010

EXHIBIT B

WRITTEN WAIVER OF POTENTIAL CONFLICT OF INTEREST

I, AHMAD NAVID, Personally, and MEHDI NAVID, Personally and MEHDI NAVID, on Behalf of Amir's Antiques & Decorative Rugs, Inc., do hereby fully understand the following:

That both Ahmad Navid and Amir's Antiques & Decorative Rugs, Inc., a corporation of which Medhi Navid is a principal, are both judgment debtors in the case of Prestige Capital Corporation v. Target Masonry & Flooring, Inc., Ahmad Navid, Amir's Antiques & Decorative Rugs, Inc., et al., Case Number 8:09 CV01467 in the U.S. District Court for the Southern District of Maryland. That Prestige obtained a default judgment against Ahmad Navid, personally, and Amir's Antiques & Decorative Rugs, Inc., in the amount of \$335,682.63, plus attorneys' fees.

That the law firm of King & Silverman, LLC, of which Robert King, Esquire, is a member, is the attorney and firm of record for Ahmad Navid in a bankruptcy proceeding currently pending in the U.S Bankruptcy Court for the District of Maryland (Greenbelt Division), Case No.: 10-16405.

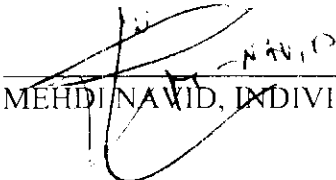
That Leslie D. Silverman, Esquire, and the law firm of Leslie D. Silverman, P.C., is the attorney and firm of record for Amir's Antiques & Decorative Rugs, Inc., in a bankruptcy proceeding currently pending in the U.S. Bankruptcy Court for the Eastern District of Virginia (Alexandria Division), Case No.: 10-12749.

That the law firm of Silverman & Silverman, LLC and Jonathan C. Silverman, Esquire, of which Leslie D. Silverman, Esquire, is a member, is the attorney and firm of record for Mehdi Navid in a bankruptcy proceeding currently pending in the U.S. Bankruptcy Court for the District of Maryland (Greenbelt Division), Case No.: 09- 31944.

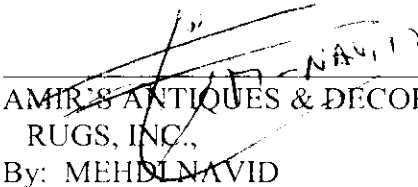
That prior to retaining both Leslie Silverman and Robert King, and subsequent to their retention, they had explained to us that a potential conflict could exist in representing both parties in these various proceedings. We have decided against hiring other counsel and have decided to proceed with Mr. King and Ms. Silverman. We waive any potential conflict in representing Ahmad Navid individually, and Amir's Antiques & Decorative Rugs, Inc., and our signatures below reflect that these matters have been fully explained to us at the time of the filing

of each bankruptcy petition in each court, and have been discussed on several occasions during the pendency of the bankruptcy proceedings and have been reiterated this date, and it remains our position that the joint representation does not present a conflict and any potential conflict is hereby waived.

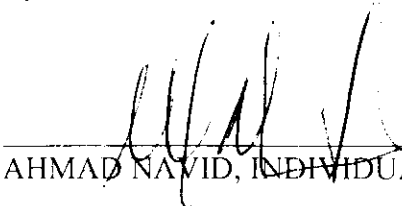
2/13/10
Date


MEHDI NAVID, INDIVIDUALLY

2/13/10
Date


AMIR'S ANTIQUES & DECORATIVE
RUGS, INC.,
By: MEHDI NAVID

2/13/10
Date


AHMAD NAVID, INDIVIDUALLY